

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

\*

v.

\*

**CRIMINAL NO. LKG-25-6**

\*

**THOMAS C. GOLDSTEIN,**

\*

**Defendant**

\*

\*

\*\*\*\*\*

**BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

The United States of America, by and through its undersigned counsel, hereby submits this Bill of Particulars for Forfeiture of Property, providing notice pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure of its intent to seek the forfeiture of certain property in the above-referenced case.

On January 16, 2025, a federal grand jury returned a twenty-two count Indictment alleging, *inter alia*, that the defendant committed a violation of 18 U.S.C. § 1014, in that he made false statements on a mortgage loan application. (ECF No. 1, Count 22, pg. 48).

The Indictment also included a forfeiture allegation, which provided notice to the defendant that upon conviction of the above offense, the United States will seek forfeiture pursuant to 18 U.S.C. § 982(a)(2).

The United States hereby gives notice that, in addition to the forfeiture allegation contained in the Indictment, the United States alleges, pursuant to 18 U.S.C. § 982(a)(2), that upon conviction of the offense alleged in Count Twenty-Two of the Indictment, the defendant shall forfeit to the United States any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of the offense, including, but not limited to, the following property: the real property located at **4323 Hawthorne Street NW, Washington, DC 20016**.

Respectfully submitted,

Erek L. Barron  
United States Attorney

By: /s/  
Patrick Kibbe  
Assistant United States Attorney

Stanley Okula  
Senior Litigation Counsel—DOJ Tax

Emerson Gordon-Marvin  
Hayter Whitman  
Trial Attorneys—DOJ Tax